

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CRAIG MEDOFF,

Defendant.

Crim. No. 24-10048-MLW

**MOTION FOR LEAVE TO FILE**  
**MOTION IN LIMINE TO PRECLUDE INADMISSIBLE TESTIMONY**

The government respectfully requests leave to file a motion *in limine* to preclude inadmissible testimony. At the pretrial conference last week, the defendant informed the Court and the government that the defendant anticipated calling two witnesses to testify about the defendant's "state of mind." Ex. A, Pretrial Conference Tr. at 18:15-16. For the reasons addressed in the government's proposed motion *in limine*, the Court should exclude inadmissible testimony of third parties regarding the defendant's state of mind.<sup>1</sup> As a basis for filing this motion *in limine* after the Court's deadline, the government respectfully submits that counsel were unaware of the substance of the testimony at issue until after the Court's deadline.

Respectfully submitted,

JOSHUA S. LEVY  
Acting United States Attorney

By: /s/ Christopher J. Markham  
LESLIE A. WRIGHT  
CHRISTOPHER J. MARKHAM  
Assistant United States Attorneys

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<sup>1</sup> A copy of the government's proposed filing is attached as Exhibit B.

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will be sent electronically to the registered participants identified on the Notice of Electronic Filing (NEF).

Dated: May 7, 2024

By: /s/ Christopher J. Markham  
CHRISTOPHER J. MARKHAM  
Assistant United States Attorney